



July 1, 2003

Mr. George Zerniak
USEPA Region 5
77 West Jackson Blvd. AE-17J
Chicago, IL 60604-3507

Subject: **Exception Report for NESHAP, Ohio EPA ID P019 and L001**

Dear Mr. Zerniak:

Morgan Electro Ceramics 3 month rolling average limit for halogenated solvent usage in degreasing operations is 30.6 lb/month/sq ft surface area. Ohio EPA ID# P019, a degreaser using perchloroethylene has exceeded this limit with 160.9 lb/month/sq ft surface area for the period of 04/01/2003 to 06/30/2003. The inherent reason for the exception was due to the unit developing a number of tank leaks. To correct this, a new unit has been purchased and will be installed during the facility shut down period 7/28/2003 to 8/8/2003.

Ohio EPA ID# L001, a degreaser using perchloroethylene has exceeded the 30.6 lb/month/sq ft surface area limit with a 75.9 lb/month/sq ft surface area for the period of 04/01/2003 to 06/30/2003. The inherent reason for this exception was due to the unit developing seal leaks in the heating section. Since this problem has occurred in the past, the manufacturer will be contacted for assistance on repairing the unit so that this problem does not continue.

Sincerely,

A handwritten signature in black ink, appearing to read 'William J. Hocevar', is written over a horizontal line.

William J. Hocevar, P.E.
Facility Manager

RECEIVED

JUL 08 2003

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Facility Name:

Morgan Electro Ceramics

EPA Facility ID:

1318031627

Unit Name:

Finishing Equipment 6342

Company I.D.:

VPD-24

Ohio EPA I.D.:

P019

Month:

April

Year:

2003

Unit Information

Tank Length (inside):

2.92

(feet)

Tank Width (inside):

1.50

(feet)

Tank Surface Area (s.a.):

4.38

(feet)²**Solvent Usage Information****Formulas / Notes**

1	Type Solvent Used	Perchloroethylene		
2	S.G. of Solvent	1.62		[From MSDS]
3	Solvent Density	13.51	(lb/gallon)	[From MSDS]
4	Solvent Added	51.0	(gallon)	[From monthly log]
5	Waste Removed	0.0	(gallon)	[From monthly log]
6	% Solvent in waste	99.90%	(%)	[From analytical report]
7	Solvent Removed in waste	0.0	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	0.0	(gallon)	[From monthly log]
9	Total Solvent Removed	0.0	(gallon)	[7 + 8]
10	Total Solvent Emitted	51.0	(gallon)	[4 + 9]
11	Total Solvent Emitted	689.1	(lbs)	[10 * 3]

Monthly Emissions

Average Solvent				
Emission Rate:	157.3	(lb/month/		[11 / (tank surface area)]
		ft ² s.a.)		
Average Solvent				
Allowable Rate:	30.6	(lb/month/		From 40 CFR 63, Subpart T
		ft ² s.a.)		

Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.

If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.

Three Month Rolling Average

3 - Month Average Solvent				
Emission Rate:	93.6	(lb/month/		[Average of three previous
		ft ² s.a.)		months solvent emission rates

Facility Name:

Morgan Electro Ceramics

EPA Facility ID:

1318031627

Unit Name:

Finishing Equipment 6342

Company I.D.:

VPD-24

Ohio EPA I.D.:

P019

Month:

May

Year:

2003

Unit Information

Tank Length (inside):

2.92

(feet)

Tank Width (inside):

1.50

(feet)

Tank Surface Area (s.a.):

4.38

(feet)²**Solvent Usage Information****Formulas / Notes**

1 Type Solvent Used

Perchloroethylene

2 S.G. of Solvent

1.62

[From MSDS]

3 Solvent Density

13.51

(lb/gallon)

[From MSDS]

4 Solvent Added

60.5

(gallon)

[From monthly log]

5 Waste Removed

0.0

(gallon)

[From monthly log]

6 % Solvent in waste

99.90%

(%)

[From analytical report]

7 Solvent Removed in waste

0.0

(gallon)

[gal. Waste] * [% solvent]

8 Pure Solvent Removed

0.0

(gallon)

[From monthly log]

9 Total Solvent Removed

0.0

(gallon)

[7 + 8]

10 Total Solvent Emitted

60.5

(gallon)

[4 + 9]

11 Total Solvent Emitted

817.4

(lbs)

[10 * 3]

Monthly Emissions

Average Solvent

Emission Rate:

186.6

(lb/month/

[11 / (tank surface area)]

Average Solvent

ft² s.a.)

Allowable Rate:

30.6

(lb/month/

From 40 CFR 63, Subpart T

ft² s.a.)Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.**Three Month Rolling Average**

3 - Month Average Solvent

Emission Rate:

155.8

(lb/month/

[Average of three previous

ft² s.a.)

months solvent emission rates

Facility Name:

Morgan Electro Ceramics

EPA Facility ID:

1318031627

Unit Name:

Finishing Equipment 6342

Company I.D.:

VPD-24

Ohio EPA I.D.:

P019

Month:

June

Year:

2003

Unit Information

Tank Length (inside):

2.92

(feet)

Tank Width (inside):

1.50

(feet)

Tank Surface Area (s.a.):

4.38

(feet)²**Solvent Usage Information****Formulas / Notes**

1	Type Solvent Used	Perchloroethylene		
2	S.G. of Solvent	1.62		[From MSDS]
3	Solvent Density	13.51	(lb/gallon)	[From MSDS]
4	Solvent Added	45.0	(gallon)	[From monthly log]
5	Waste Removed	0.0	(gallon)	[From monthly log]
6	% Solvent in waste	99.90%	(%)	[From analytical report]
7	Solvent Removed in waste	0.0	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	0.0	(gallon)	[From monthly log]
9	Total Solvent Removed	0.0	(gallon)	[7 + 8]
10	Total Solvent Emitted	45.0	(gallon)	[4 + 9]
11	Total Solvent Emitted	608.0	(lbs)	[10 * 3]

Monthly Emissions

Average Solvent			
Emission Rate:	138.8	(lb/month/ft ² s.a.)	[11 / (tank surface area)]
Average Solvent			
Allowable Rate:	30.6	(lb/month/ft ² s.a.)	From 40 CFR 63, Subpart T

Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.

If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.

Three Month Rolling Average

3 - Month Average Solvent			
Emission Rate:	160.9	(lb/month/ft ² s.a.)	[Average of three previous months solvent emission rates

Facility Name:

Morgan Electro Ceramics

EPA Facility ID:

1318031627

Unit Name:

Baron Blakeslee MLR-280LE

Company I.D.:

VPD-34

Ohio EPA I.D.:

L001

Month:

April

Year:

2003

Unit Information

Tank Length (inside):

3.67

(feet)

Tank Width (inside):

2.67

(feet)

Tank Surface Area (s.a.):

9.79

(feet)²

Solvent Usage Information

Formulas / Notes

1	Type Solvent Used	Perchloroethylene		
2	S.G. of Solvent	1.62		[From MSDS]
3	Solvent Density	13.51	(lb/gallon)	[From MSDS]
4	Solvent Added	24.0	(gallon)	[From monthly log]
5	Waste Removed	0.0	(gallon)	[From monthly log]
6	% Solvent in waste	99.90%	(%)	[From analytical report]
7	Solvent Removed in waste	0.0	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	0.0	(gallon)	[From monthly log]
9	Total Solvent Removed	0.0	(gallon)	[7 + 8]
10	Total Solvent Emitted	24.0	(gallon)	[4 + 9]
11	Total Solvent Emitted	324.3	(lbs)	[10 * 3]

Monthly Emissions

Average Solvent Emission Rate:	33.1	(lb/month/ft ² s.a.)	[11 / (tank surface area)]
Average Solvent Allowable Rate:	30.6	(lb/month/ft ² s.a.)	From 40 CFR 63, Subpart T

Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.

If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.

Three Month Rolling Average

3 - Month Average Solvent Emission Rate:	20.7	(lb/month/ft ² s.a.)	[Average of three previous months solvent emission rates]
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Facility Name:

Morgan Electro Ceramics

EPA Facility ID:

1318031627

Unit Name:

Baron Blakeslee MLR-280LE

Company I.D.:

VPD-34

Ohio EPA I.D.:

L001

Month:

May

Year:

2003

Unit Information

Tank Length (inside):

3.67

(feet)

Tank Width (inside):

2.67

(feet)

Tank Surface Area (s.a.):

9.79

(feet)²**Solvent Usage Information****Formulas / Notes**

1	Type Solvent Used	Perchloroethylene		
2	S.G. of Solvent	1.62		[From MSDS]
3	Solvent Density	13.51	(lb/gallon)	[From MSDS]
4	Solvent Added	65.0	(gallon)	[From monthly log]
5	Waste Removed	0.0	(gallon)	[From monthly log]
6	% Solvent in waste	99.90%	(%)	[From analytical report]
7	Solvent Removed in waste	0.0	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	0.0	(gallon)	[From monthly log]
9	Total Solvent Removed	0.0	(gallon)	[7 + 8]
10	Total Solvent Emitted	65.0	(gallon)	[4 + 9]
11	Total Solvent Emitted	878.2	(lbs)	[10 * 3]

Monthly Emissions

Average Solvent Emission Rate:	89.7	(lb/month/ft ² s.a.)	[11 / (tank surface area)]
Average Solvent Allowable Rate:	30.6	(lb/month/ft ² s.a.)	From 40 CFR 63, Subpart T

Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.

If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.

Three Month Rolling Average

3 - Month Average Solvent Emission Rate:	46.9	(lb/month/ft ² s.a.)	[Average of three previous months solvent emission rates
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Facility Name:

Morgan Electro Ceramics

EPA Facility ID:

1318031627

Unit Name:

Baron Blakeslee MLR-280LE

Company I.D.:

VPD-34

Ohio EPA I.D.:

L001

Month:

June

Year:

2003

Unit Information

Tank Length (inside):

3.67

(feet)

Tank Width (inside):

2.67

(feet)

Tank Surface Area (s.a.):

9.79

(feet)²

Solvent Usage Information				Formulas / Notes
1	Type Solvent Used	Perchloroethylene		
2	S.G. of Solvent	1.62		[From MSDS]
3	Solvent Density	13.51	(lb/gallon)	[From MSDS]
4	Solvent Added	76.0	(gallon)	[From monthly log]
5	Waste Removed	0.0	(gallon)	[From monthly log]
6	% Solvent in waste	99.90%	(%)	[From analytical report]
7	Solvent Removed in waste	0.0	(gallon)	[gal. Waste] * [% solvent]
8	Pure Solvent Removed	0.0	(gallon)	[From monthly log]
9	Total Solvent Removed	0.0	(gallon)	[7 + 8]
10	Total Solvent Emitted	76.0	(gallon)	[4 + 9]
11	Total Solvent Emitted	1026.8	(lbs)	[10 * 3]
Monthly Emissions				
Average Solvent Emission Rate:				
		104.9	(lb/month/ft ² s.a.)	[11 / (tank surface area)]
Average Solvent Allowable Rate:				
		30.6	(lb/month/ft ² s.a.)	From 40 CFR 63, Subpart T
<p>Note: If ave. solvent emission rate is < 30.6 lb/month/ft², NO action is required.</p> <p>If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.</p>				
Three Month Rolling Average				
3 - Month Average Solvent Emission Rate:				
		75.9	(lb/month/ft ² s.a.)	[Average of three previous months solvent emission rates